

UNITED STATES,  
  
Plaintiffs,  
  
v.  
  
ENVIGO RMS, LLC,  
  
Defendant.

I, Carmen Wilbourn, declare the following to be true and correct to the best of my knowledge:

2. I've been in the industry for over 35 years. For the 15 years prior to joining Envigo, I was responsible for ensuring the proper and lawful operations of animal facilities across the globe, and have had more than 1,500 employees reporting up through me.

3. In July 2021, the Cumberland facility was one of the 11 sites I oversaw. That month, the United States Department of Agriculture (“USDA”) inspected the Cumberland facility. We used the reports from that inspection in our efforts to prioritize improvements we needed to make at the facility, and began to implement those solutions. In the following months, Envigo invested significant resources to upgrade the facility and the animal care program.

4. Over the past year, we have made major improvements to the facility and staffing, including installing over 1,200 new aluminum dog doors, correcting gaps in enclosures, relocation of and upgrading the flooring in the weaning and whelping area, purchasing over 500 whelping boxes, installing generators and cooling towers to regulate temperature, hiring a board-certified veterinarian behaviorist to assist with the aggression issues, transferring veterinary staff from other Inotiv facilities, and hiring a contract veterinarian to assist with dentals, as well as hiring additional staff. All these efforts were aimed at improving the health and experience of the dogs, and also addressing issues raised by the USDA. We continued to make improvements to the facility as part of a collaborative dialogue with the USDA over a series of months.

5. I was present during the execution of the search warrant on May 18–22, 2022, and during the inspection on June 8, 2022.

6. Since the Court Order issued on May 21, 2022, our entire team at Envigo’s Cumberland facility has been working tirelessly to respond to the requirements in the Order and to care for the dogs. Actions we have taken include:

- a. On the weekend the Court Order was issued, a family member of our staff drove more than 200 miles to pet supply and general stores in the area to buy all of the food/water bowls available.

- b. Ordering 2,000 steel food/water bowls for gradual introduction into the enclosures, at a cost of nearly \$6,000.
- c. Purchasing and trialing black rubber mats in enclosures to address concerns with the flooring, at a cost of over \$334,000.
- d. Ordering and installing partitions for enclosures at a cost of \$213,000.
- e. Installing additional cooling equipment to ensure temperature regulation.
- f. Researching and helping order enough compounded medications to treat all dogs in the facility for Giardia when one had tested positive.

7. Envigo ceased all breeding, selling, or otherwise dealing in beagles at the Cumberland Facility immediately upon receiving notice of the Court's Order, and has not resumed any breeding, selling, or otherwise dealing in beagles since the Order was issued.

8. My team and I continue to work every day on improving the conditions at the facility and caring for the dogs. Maintaining the quality of life for the dogs requires constant vigilance. We are committed to continuing to provide a high level of care and attention for as long as the facility remains in operation.

9. Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on June 13, 2022.

  
Carmen Wilbourn